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Attorneys for Plaintiff  
United States of America

IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,  
  
Plaintiff,  
  
v.  
  
DYLAN CORRAL,  
  
Defendant.

CASE NO. 2:22-CR-00048-JCC

STIPULATION TO SET TRIAL AND REGARDING  
EXCLUDABLE TIME PERIODS UNDER SPEEDY  
TRIAL ACT; [~~PROPOSED~~] ORDER

DATE: October 2, 2023

COURT: Hon. U.S. District Judge John C. Coughenour

**STIPULATION**

Plaintiff United States of America, by and through its counsel of record, and defendant, by and through defendant's counsel of record, hereby stipulate as follows:

1. By previous order, this matter was scheduled for trial on October 2, 2023.
2. By this stipulation, the parties move to continue the trial to December 4, 2023.
3. The parties agree and stipulate, and request that the Court find the following:
  - a) Initial discovery was provided to defendant on or about June 17, 2022, consisting of 913 Bates-stamped items, including reports of investigation, an audio- and video-recorded interview of the defendant, photographs, and a summary of defendant's criminal history.
  - b) Counsel for defendant desires additional time to prepare for trial and pretrial motions. Specifically, defense needs time to prepare for his client's competency hearing, visit his client at MDC Los Angeles (which is difficult for counsel to visit to prepare for trial), visit

the crime scene (which has been delayed due to COVID restrictions), investigate and research his client's duress defense (including consulting with toxicity experts), and conduct investigation relevant to the government's 404(b) motion.

c) Counsel for defendant believes that failure to grant the above-requested continuance would deny him the reasonable time necessary for effective preparation, taking into account the exercise of due diligence.

d) Based on the above-stated findings, the ends of justice served by continuing the case as requested outweigh the interest of the public and the defendant in a trial within the original date prescribed by the Speedy Trial Act.

e) For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161, et seq., within which trial must commence, the time period of October 2, 2023, to December 4, 2023, inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv), because it results from a continuance granted by the Court request on the basis of the Court's finding that the ends of justice served by taking such action outweigh the best interest of the public and the defendant in a speedy trial.

4. Nothing in this stipulation and order shall preclude a finding that other provisions of the Speedy Trial Act provide that additional time periods are excludable from the period within which a trial must commence.

IT IS SO STIPULATED.

Dated: March 31, 2023

PHILLIP A. TALBERT  
United States Attorney

/s/ JUSTIN J. GILIO  
JUSTIN J. GILIO  
Assistant United States Attorney

Dated: March 31, 2023

/s/ DOUGLAS J. BEEVERS  
DOUGLAS J. BEEVERS  
Counsel for Defendant  
DYLAN CORRAL

**[PROPOSED] ORDER**

So FOUND and ORDERED this 4th day of April 2023.

A handwritten signature in black ink, reading "John C. Coughenour", written over a horizontal line.

John C. Coughenour  
UNITED STATES DISTRICT JUDGE